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March 28, 2014

California Air Resources Board 1001 I Street Sacramento, CA 95812

[Submitted electronically via capandtrade13 Board Item at http://www.arb.ca.gov/lispub/comm/bclist.php]

Subject:

Additional Comments for 15 DAY PUBLIC COMMENT PERIOD TO CONSIDER AMENDMENTS TO THE CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS – Paper Mill Tissue Product-Based Benchmark Table 9-1

Chairman Nichols and Members of the Board:

The Procter & Gamble Paper Products Company (P&G) appreciates the opportunity to comment on CARB's 2013 Proposed Regulation Amendments related to Paper Mill product-based benchmarks. P&G has a manufacturing facility in Oxnard, where we manufacture Bounty paper towels and Charmin toilet tissue, and distribute our product throughout the western United States.

The Procter & Gamble Paper Products Company recognizes the considerable effort CARB has invested in compiling extensive and detailed data to develop the proposed amendment which is consistent with existing benchmark principles. We agree and support the proposed regulation amendment on table 9-1 for these paper mill product-based benchmarks that was posted for the 15 day public notice.

We thank the Board and CARB staff for their work on updating the Paper Mill product benchmark and for the opportunity to provide these comments on the tissue product benchmark revisions.

Respectfully,

Kara Roeder

Plant Manager, Oxnard

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